CONSTRUCTION PERMIT
and MINOR SOURCE OPERATING PERMIT
Office of Air Quality

International Wire, Inc. - Corunna East/Silicones
1720 US 6
Corunna, IN 46730

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 033-11074-00059	
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 18, 2001

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary insulated residential and commercial electrical wire manufacturing operation.

Authorized Individual:	John Auld
Source Address:	1720 US 6, Corunna, IN 46730
Mailing Address:	1720 US 6, Corunna, IN 46730
Phone Number:	219-897-2535
SIC Code:	3357
County Location:	Dekalb
County Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD Rules;

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

(a) one drawn copper wire operation, with a maximum capacity of 1,449.58 pounds of raw material per hour, exhausting to the interior of the building, consisting of the following:
  (1) one (1) Cooling tower, identified as CT1;
  (2) twenty-two (22) wire bunchers, identified as WB1 through WB22;
  (3) three (3) wire respoolers, identified as RS1 through RS3;
  (4) one (1) Rodmill, identified as RM1; and
  (5) two (2) filter presses, identified as FP1 and FP2.
  (6) one (1) stem packer, identified as SP1;
  (7) twelve (12) stem feeders, identified as SF1 through SF12;
  (8) one (1) multi-wire draw, identified as MWD1; and
  (9) two (2) bundle packers, identified as BP1 and BP2.

(b) one (1) PVC extruded copper wire operation, with a maximum capacity of 3,422.64 pounds per hour, located in plant 1, exhausting to the interior of the building, consisting of the following:
  (1) six (6) PVC delivery systems, identified as PVC D1 through D6;
  (2) six (6) PVC extrusion machines, identified as PE 1 through 6; and
  (3) six (6) Ink roll coaters, identified as IR 1 through 6.
  (4) four (4) PVC storage silos, identified as SIL1 through SIL4;

(c) one (1) PVC extruded copper wire operation, with a maximum capacity of 20.26 pounds per hour, located in plant 2, exhausting to the interior of the building, consisting of the following:
  (1) one (1) PVC delivery system, identified as PVCD7;
  (2) one (1) PVC extrusion machine, identified as PE7; and
  (3) one (1) Ink roll coater, identified as IR7.

(d) one (1) silicone wire coating operation, with a maximum capacity of 694.72 pounds per hour, located in plant 2, exhausting to the interior of the building, consisting of the following:
  (1) four (4) silicone extrusion lines, identified as SE1 through SE4;
  (2) one (1) wire coating line identified as WC1;
  (3) one-hundred forty-five (145) wire braiders, identified as WBR1 through WBR145; and
  (4) eight (8) wire finishing lines, identified as WF1 through WF.

(e) Two (2) oxy-acetylene torch, identified as OXY1 and OXY2, each with a maximum metal cutting rate of 40 inches per minute, exhausting to the interior of the building;

(f) Two (2) stick welding stations, identified as WLD1 and WLD2, each consuming five (5) electrodes per hour, exhausting to the interior of the building;

(g) Two (2) parts washing degreasing operations identified as PW1 and PW2, exhausting to the interior of the building;

(h) Fourteen (14) liquid propane gas fire small space heaters with a heat input capacity of 0.15 mmBtu per hour for each unit, identified as H1 through H14, exhausting to stacks H1 through H14, respectively; and

(i) Miscellaneous grinders, drill presses, and bandsaws, identified as G1-2, DP1-3, exhausting to the interior of the building, and BS1.

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Modification to Permit [326 IAC 2]

All requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

(a) The attached affidavit of construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section, verifying that the emissions units were constructed as proposed in the application. The emissions units covered in the Construction Permit may begin operating on the date the affidavit of construction is postmarked or hand delivered to IDEM.

(b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

(c) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.

(d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

(e) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

B.7 NSPS Reporting Requirement

That pursuant to the New Source Performance Standards (NSPS), (40 CFR 60.460 Subpart TT, Metal Coil Surface Coating), the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

(a) Commencement of construction date (no later than 30 days after such date);

(b) Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);

(c) Actual start-up date (within 15 days after such date); and

(d) Date of performance testing (at least 30 days prior to such date), when required by a condition elsewhere in this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 Minor Source Status [326 IAC 2-7] [326 IAC 2-2] [40 CFR 52.21]

(a) The total source potential to emit of all criteria pollutants is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

(b) The total source potential to emit of any individual hazardous air pollutant (HAP) is less than 10 tons per year, and the total source potential to emit of any combination of HAPs is less than 25 tons per year, therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) will not apply.

(c) Any change or modification which may increase potential to emit of any regulated pollutant to 100 tons per year from this source, shall cause this source to be considered a major source under 326 IAC 2-7, and shall require approval from IDEM, OAQ prior to making the change.

(d) Any change or modification which may increase potential to emit of any individual HAP to 10 tons per year or any combination of HAPs to 25 tons per year from this source, shall cause this source to be considered a major source under 326 IAC 2-7, and shall require approval from IDEM, OAQ prior to making the change.

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each emissions unit:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ.

C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of [326 IAC 2-6.1-6] whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

(c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAQ, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAQ, nor an authorized representative, may disclose the information unless and until IDEM, OAQ, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

(2) The Permittee, and IDEM, OAQ, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.7 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.8 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

Testing Requirements

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date. The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.12 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected emissions unit while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected emissions unit.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.13 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.14 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.15 General Record Keeping Requirements [326 IAC 2-6.1-2]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-Annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) A malfunction as described in 326 IAC 1-6-2; or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions unit Description

(a) one drawn copper wire operation, with a maximum capacity of 1,449.58 pounds of raw material per hour, exhausting to the interior of the building, consisting of the following:
- (1) one (1) Cooling tower, identified as CT1;
- (2) twenty-two (22) wire bunchers, identified as WB1 through WB22;
- (3) three (3) wire respoolers, identified as RS1 through RS3;
- (4) one (1) Rodmill, identified as RM1; and
- (5) two (2) filter presses, identified as FP1 and FP2.
- (6) one (1) stem packer, identified as SP1;
- (7) twelve (12) stem feeders, identified as SF1 through SF12;
- (8) one (1) multi-wire draw, identified as MWD1; and
- (9) two (2) bundle packers, identified as BP1 and BP2.

(b) one (1) PVC extruded copper wire operation, with a maximum capacity of 3,422.64 pounds per hour, located in plant 1, exhausting to the interior of the building, consisting of the following:
- (1) six (6) PVC delivery systems, identified as PVC D1 through D6;
- (2) six (6) PVC extrusion machines, identified as PE 1 through 6; and
- (3) six (6) Ink roll coaters, identified as IR 1 through 6.
- (4) four (4) PVC storage silos, identified as SIL1 through SIL4;

(c) one (1) PVC extruded copper wire operation, with a maximum capacity of 20.26 pounds per hour, located in plant 2, exhausting to the interior of the building, consisting of the following:
- (1) one (1) PVC delivery system, identified as PVCD7;
- (2) one (1) PVC extrusion machine, identified as PE7; and
- (3) one (1) Ink roll coater, identified as IR7.

(d) one (1) silicone wire coating operation, with a maximum capacity of 694.72 pounds per hour, located in plant 2, exhausting to the interior of the building, consisting of the following:
- (1) four (4) silicone extrusion lines, identified as SE1 through SE4;
- (2) one (1) wire coating line identified as WC1;
- (3) one-hundred forty-five (145) wire braiders, identified as WBR1 through WBR145; and
- (4) eight (8) wire finishing lines, identified as WF1 through WF.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coatings applied to metal parts or products in shall be limited to 3.5 pounds of VOC per gallon of coating less water delivered to the applicator, for air dried, forced warm air dried, or extreme performance coatings. The volume-weighted average VOC content shall be determined by use of the equation:

Volume-Weighted Average = 3(individual coating usage (gal/hr)* Ec) / 3(coating usage (gal/hr))

where: Ec = pounds of VOC per gallon of coating less water for each coating

(b) Solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Compliance Determination Requirements

D.1.2 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.3 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.4 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent month.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.5 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each day;

(4) The cleanup solvent usage for each day;

(5) The total VOC usage for each day; and

(6) The weight of VOCs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

Emissions unit Description
(a) Two (2) oxy-acetylene torch, identified as OXY1 and OXY2, each with a maximum metal cutting rate of 40 inches per minute, exhausting to the interior of the building;
(b) Two (2) stick welding stations, identified as WLD1 and WLD2, each consuming five (5) electrodes per hour, exhausting to the interior of the building;
(c) Two (2) parts washing degreasing operations identified as PW1 and PW2, exhausting to the interior of the building;
(d) Fourteen (14) liquid propane gas fire small space heaters with a heat input capacity of 0.15 mmBtu per hour for each unit, identified as H1 through H14, exhausting to stacks H1 through H14, respectively; and
(e) Miscellaneous grinders, drill presses, and bandsaws, identified as G1-2, DP1-3, exhausting to the interior of the building, and BS1.
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

The cold cleaner degreasing operations PW 1 and PW2 are subject to this rule. These degreasing operations shall comply with the following requirements.

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.2.2 Process Operations [326 IAC 6-3-2]

The particulate matter (PM) from the two (2) oxy-acetylene torches, identified as OXY1 and OXY2; two (2) stick welding stations, identified as WLD1 and WLD2; miscellaneous grinders, drill presses, and bandsaws, identified as G1-2, DP1-3 shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Conditions D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality
FAX NUMBER - 317 233-5967

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: International Wire, Inc. - Corunna East/Silicones PHONE NO. (219) 897-2535
LOCATION: (CITY AND COUNTY) Corunna, Dekalb County
PERMIT NO. MSOP 033-11074-00059 AFS PLANT ID: 033-00059 AFS POINT ID: _____ INSP: Doyle Houser
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:_____
_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 19____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:_____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 19____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO_2, VOC, OTHER:_____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____

_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____

_____

Mail to: Permit Administration & Development Section
Office Of Air Management
100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015

International Wire, Inc. - Corunna East/Silicones
1720 US 6
Corunna, IN 46730

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of _____ for _____.
(Title) (Company Name)

3. By virtue of my position with _____,I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____ .
(Company Name)

4. I hereby certify that International Wire, Inc. - Corunna East/Silicones, 1720 US 6, Corunna, IN 46730, has constructed the modification to the insulated residential and commercial electrical wire manufacturing operation in conformity with the requirements and intent of the construction permit application received by the Office of Air Management on June 21, 1999 and as permitted pursuant to **Minor Source Operating Permit No. 033-11074, Plant ID No. 033-00059** issued on _____

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

_____
Signature

_____
Date

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana on this _____ day of _____, 19 _____ .

My Commission expires: _____

_____
Signature

_____
Name (typed or printed)

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a Minor Source Operating Permit

Source Name: International Wire, Inc. - Corunna East/Silicones
Source Location: 1720 US 6, Corunna, IN 46730
County: Dekalb
Operation Permit No.: MSOP 033-11074-00059
SIC Code: 3357
Permit Reviewer: Phillip Ritz/EVP

On August 23, 1999, the Office of Air Quality (OAQ) had a notice published in the Auburn Evening Star, Auburn, Indiana, stating that International Wire, Inc. - Corunna East/Silicones had applied for a Minor Source Operating Permit to construct and operate a modification to an insulated residential and commercial electrical wire manufacturing operation. The notice also stated that OAQ proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On September 1, 1999, Kevin Parks of SER submitted comments on behalf of International Wire, Inc. - Corunna East/Silicones on the proposed Minor Source Operating Permit. The summary of the comments and corresponding responses is as follows:

Comment 1
I would like to request, on behalf of International Wire, Inc. - Corunna East/Silicones, that the applicability of 40 CFR 460, Subpart TT and 326 IAC 8-2-4, Surface Coating Emissions Limitations: Coil Coating Operations, be investigated further to confirm their applicability to this source. The reasons I request this investigation are as follows:

(a) The source receives raw copper would around a spool and not coiled or rolled upon itself. Additionally, the copper is neither received nor processed as a flat piece or strip before, during, or after the manufacturing process.

(b) The silicone material is not truly an organic coating. Further, the application of silicone and PVC are not applied to a coil.

(c) The inking operation is not utilized as a secondary coating. This material is used to mark the wire to indicate its type.

Response 1

(a) Upon further review, 40 CFR 60.460 Subpart TT (Metal Surface Coating) does not apply as the coating is not applied to the surface of a metal coil, and there are no metal coils surface coating operations at the source.

(b) 326 IAC 8-2-4 does not apply to the inking, silicone, or PVC application operations as the coating is not applied to the surface of a metal coil, and there are no metal coils surface coating operations at the source. However, the metal surface coating operations are subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations). Pursuant to this rule, sources commence construction after July 1, 1990 and have actual emissions of greater than 15 pounds of VOC per day shall not cause, allow or permit the discharge of VOC into the atmosphere in excess of 3.5 pounds per gallon of coating,

less water, for forced air dried coatings. This container surface coating source will use coating materials with VOC content of no more than 3.5 pounds per gallon of coating, less water. The surface coatings at the source will be dried with forced air.

The changes to the permit are as follows to remove Subpart TT and 326 IAC 8-2-4, which do not apply to the source:

~~D.1.1 General Provisions Relating to Standards of Performance for New Stationary Sources [326 IAC 12-1][40 CFR 60, Subpart A]~~

~~The provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated as 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR 60.460 Subpart TT.~~

~~D.1.2 New Source Performance Standard, 326 IAC 12, (40 CFR 60.460 Subpart TT)~~

~~The PVC extrusion systems are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.460 Subpart TT). Pursuant to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.460 Subpart TT), the owner/operator shall not cause to discharge into the atmosphere more than 0.28 kilogram VOC per liter (2.34 pounds per gallon) of coating solids for the PVC extrusion systems that do not use emission control devices.~~

~~D.1.3 Coil Coating Operations [326 IAC 8-2-4]~~

~~Pursuant to 326 IAC 8-2-4 (Coil Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied to any flat metal sheets or strips that are delivered in rolls or coils shall be limited to 2.6 pounds VOC per gallon of coating less water delivered to the applicator. The volume-weighted average VOC content shall be determined by use of the equation:~~

~~Volume-Weighted Average = (individual coating usage (gal/hr)* Ec) / (coating usage (gal/hr))~~

~~where: Ec = pounds of VOC per gallon of coating less water for each coating~~

326 IAC 8-2-9 has been added to the source as follows:

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coatings applied to metal parts or products in shall be limited to 3.5 pounds of VOC per gallon of coating less water delivered to the applicator, for air dried, forced warm air dried, or extreme performance coatings. The volume-weighted average VOC content shall be determined by use of the equation:

Volume-Weighted Average = 3(individual coating usage (gal/hr)* Ec) / 3(coating usage (gal/hr))

where: Ec = pounds of VOC per gallon of coating less water for each coating

(b) Solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Compliance Determination Requirements

D.1.~~4~~**2** Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition~~s D.1.2 and~~ D.1.~~3~~**1** shall be determined by a performance test conducted in accordance with Section C -

Performance Testing.

D.1.~~5~~**3** Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition~~s D.1.2 and~~ D.1.~~3~~**1** shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.~~6~~**4** VOC Emissions

Compliance with Condition~~s D.1.2 and~~ D.1.~~3~~**1** shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent month.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.~~7~~**5** Record Keeping Requirements

(a) To document compliance with Condition~~s D.1.2 and~~ D.1.~~3~~**1**, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition~~s D.1.2 and~~ D.1.~~3~~**1**.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each day;

(4) The cleanup solvent usage for each day;

(5) The total VOC usage for each day; and

(6) The weight of VOCs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name: International Wire, Inc. - Corunna East/Silicones
Source Location: 1720 US 6, Corunna, IN 46730
County: Dekalb
SIC Code: 3357
Operation Permit No.: MSOP 033-11074-00059
Permit Reviewer: Phillip Ritz/EVP

The Office of Air Management (OAM) has reviewed an application from International Wire, Inc. - Corunna East/Silicones, previously owned by Hoosier Wire, Inc., relating to the construction and operation of a modification to an insulated residential and commercial electrical wire manufacturing operation.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) one drawn copper wire operation, with a maximum capacity of 1,449.58 pounds of raw material per hour, exhausting to the interior of the building, consisting of the following:
  (1) one (1) Cooling tower, identified as CT1;
  (2) twenty-two (22) wire bunchers, identified as WB1 through WB22;
  (3) three (3) wire respoolers, identified as RS1 through RS3;
  (4) one (1) Rodmill, identified as RM1; and
  (5) two (2) filter presses, identified as FP1 and FP2.

(b) one (1) PVC extruded copper wire operation, with a maximum capacity of 3,422.64 pounds per hour, located in plant 1, exhausting to the interior of the building, consisting of the following:
  (1) six (6) PVC delivery systems, identified as PVC D1 through D6;
  (2) six (6) PVC extrusion machines, identified as PE 1 through 6; and
  (3) six (6) Ink roll coaters, identified as IR 1 through 6.

(c) One (1) parts washing degreasing operation identified as PW1, exhausting to the interior of the building;

(d) One (1) oxy-acetylene torch, identified as OXY1, with a maximum metal cutting rate of 40 inches per minute, exhausting to the interior of the building;

(e) One (1) stick welding station, identified as WLD1, consuming five (5) electrode per hour, exhausting to the interior of the building;

(f) Fourteen (14) liquid propane gas fire small space heaters with a heat input capacity of 0.15 mmBtu per hour for each unit, identified as H1 through H14, exhausting to stack H1 through H14, respectively; and

(g) Miscellaneous grinders, drill presses, and bandsaws, identified as G1-2, DP1-3, and BS1, exhausting to the interior of the building.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Prior Approval

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-5:

(a) one drawn copper wire operation, with a maximum capacity of 1,449.58 pounds of raw material per hour, exhausting to the interior of the building, consisting of the following:
  (1) one (1) stem packer, identified as SP1;
  (2) twelve (12) stem feeders, identified as SF1 through SF12;
  (3) one (1) multi-wire draw, identified as MWD1; and
  (4) two (2) bundle packers, identified as BP1 and BP2.

(b) one (1) silicone wire coating operation, with a maximum capacity of 694.72 pounds per hour, located in plant 2, exhausting to the interior of the building, consisting of the following:
  (1) four (4) silicone extrusion lines, identified as SE1 through SE4;
  (2) one (1) wire coating line identified as WC1;
  (3) one-hundred forty-five (145) wire braiders, identified as WBR1 through WBR145; and
  (4) eight (8) wire finishing lines, identified as WF1 through WF.

(c) one (1) PVC extruded copper wire operation, with a maximum capacity of 3,422.64 pounds per hour, located in plant 1, exhausting to the interior of the building, consisting of the following:
  (1) four (4) PVC storage silos, identified as SIL1 through SIL4;

(d) one (1) PVC extruded copper wire operation, with a maximum capacity of 20.26 pounds per hour, located in plant 2, exhausting to the interior of the building, consisting of the following:
  (1) one (1) PVC delivery system, identified as PVCD7;
  (2) one (1) PVC extrusion machine, identified as PE7; and
  (3) one (1) Ink roll coater, identified as IR7.

(e) One (1) oxy-acetylene torch, identified as OXY2, exhausting to the interior of the building, with a maximum metal cutting rate of 40 inches per minute;

(f) One (1) stick welding station, identified as WLD2, consuming five (5) electrode per hour, exhausting to the interior of the building; and

(g) One (1) parts washing degreasing operation identified as PW2, exhausting to the interior of the building.

History

In June 1995, the facility known as Hoosier Wire, Inc. located at 1720 US 6, Corunna, IN 46730 was purchased by International Wire, Inc. International Wire, Inc has consolidated the operation from the two (2) buildings located at this site into the east-most building. Additionally, there have been industrial technology changes implemented at the facility which have reduced the overall number of pieces of equipment and the subsequent potential to emit. Also, the existing facility, located at 6928 North 400 East, Kendallville, Indiana, will be moved to the site 1720 US 6, Corunna, IN 46730.

Existing Approvals

The source (International Wire, Inc. - Corunna East/Silicones, previously owned by Hoosier Wire, Inc.) has been operating under previous approvals including, but not limited to, the following:

(a) CP-033-5439-00059, issued on November 1, 1996.

All conditions from previous approvals were incorporated into this permit.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
F1	Wire/Drawing and PVC Extrusion	22	0.5	3,500	Ambient
F2	Wire/Drawing and PVC Extrusion	22	0.5	3,500	Ambient
F3	Wire/Drawing and PVC Extrusion	22	0.5	3,500	Ambient

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on June 21, 1999.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 6.)

Potential To Emit of the Entire Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	0.32
PM-10	0.32
SO_2	0.01
VOC	50.08
CO	0.83
NO_x	0.99

HAP’s	Potential To Emit (tons/year)
Xylene	0.04
Toluene	7.65
Dimethylformamide	2.16
MEK	2.41
Antimony	3.71
Glycol Ethers	0.76
Magnesium	0.02
TOTAL	16.74

(a) The potential to emit (as defined in 326 IAC 2-5.1-3) of VOC is equal to or greater than 25 tons per year, but less than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-5.

(b) The potential to emit (as defined in 326 IAC 2-5.1-3) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.

Actual Emissions

No previous emission data has been received from the source.

County Attainment Status

The source is located in Dekalb County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Dekalb County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Dekalb County has been classified as attainment or unclassifiable for all other criteria pollutant(s). Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO_2 (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO_x (ton/yr)
Proposed Modification	0.20	0.20	0.00	26.00	0.00	0.00
PSD Threshold Level	250	250	250	250	250	250

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than 100 tons per year,
(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
(c) any combination of HAPs is less than 25 tons/year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAM inspector assigned to the source.

Federal Rule Applicability

(a) The PVC extrusion systems are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.460 Subpart TT, Metal Coil Surface Coating), as this source applies organic coatings to the surface of a continuous metal strip with a thickness of 0.006 in or more that is packaged in a roll or coil. Pursuant to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.460 Subpart TT Metal Coil Surface Coating):

(1) the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

(A) commencement of construction date (no later than 30 days after such date);

(B) Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);

(C) Actual start-up date (within 15 days after such date); and
Reports are to be sent to:
Compliance Data Section
Office of Air Management
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015

The application and enforcement of these standards have been delegated to the IDEM-OAM. The requirements of 40 CFR Part 60 are also federally enforceable.

(2) the owner/operator shall not cause to be discharged into the atmosphere more than 0.28 kilogram VOC per liter (2.34 pounds per gallon) of coating solids for the PVC extrusion systems that do not use emission control devices.
Based on the calculations as shown in Appendix A, page 6 of 6, the PVC coating operations comply with the requirements. The volume-weighted average VOC content shall be determined by use of the equation:

Volume-Weighted Average = (individual coating usage (gal/hr)* Ec) / (coating usage (gal/hr))

where: Ec = pounds of VOC per gallon of coating less water for each coating

(3) The owner/operator shall keep records of the weighed average of VOC content of coating used during a period of one calendar month for each affected facility. These records of all data and calculations used to determine monthly VOC emissions form each affected facility, shall be maintained for a period of at least two (2) years.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-4.1-1 (New Source Toxics Control)

This source is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control). The single and total HAP emissions are less than 10 and 25 tons per year, respectively.

326 IAC 2-6 (Emission Reporting)

This source is located in Dekalb County and the potential to emit all regulated pollutants is less than one hundred (100) tons per year. The source is not one of the twenty-eight (28) listed sources and its potential to emit PM10 is less than one-hundred (100) tons per year including fugitive emissions, therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the two (2) oxy-acetylene torches, identified as OXY1 and OXY2; two (2) stick welding stations, identified as WLD1 and WLD2; miscellaneous grinders, drill presses, and bandsaws, identified as G1-2, DP1-3 shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

326 IAC 8-2-4 (Coil Coating Operations)

That pursuant to 326 IAC 8-2-4 (Coil Coating Operations), the volatile organic compound (VOC) content of coatings applied to any flat metal sheets or strips that are delivered in rolls or coils shall be limited to 2.6 pounds VOC per gallon of coating less water delivered to the applicator.

Pursuant to MSDS submitted by the applicant, and to the compliance calculations made (see page 6 of 6 Appendix A), the volume-weighted average VOC content from the wire coating operation is less than 2.6 lb/gal, therefore, this facility is in compliance with 326 IAC 8-2-4 (Coil Coating Operations). The volume-weighted average VOC content shall be determined by use of the equation:

Volume-Weighted Average = 3(individual coating usage (gal/hr)* Ec) / 3(coating usage (gal/hr))

where: Ec = pounds of VOC per gallon of coating less water for each coating

326 IAC 8-3-5 (Organic Solvent Degreasing Operation and Control)

The cold cleaner, Parts washer solvent, which uses solvent with a vapor pressure of 0.19 psia at a rate of 0.236 gallons per hour, is subject to 326 IAC 8-3-5 (Organic Solvent Degreasing Operation and Control). Pursuant to this rule, the owner/operator of a cold degreaser shall: (1) equip the degreaser with a cover; (2) equip the degreaser with a facility for draining cleaned articles; (3) provide a permanent, conspicuous label which lists the operating requirements; and (4) employ a solid, fluid stream at a pressure which does not cause excessive splashing, if solvent spray is used. The operating requirements are: (1) close the cover whenever articles are not being handled in the degreaser; (2) drain cleaned articles for at least fifteen (15) seconds or until dripping ceases; and (3) store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

326 IAC 8-5-5 (Graphics Arts Operations)

This source is not subject to the requirements of 326 IAC 8-5-5 (Graphics Arts Operations), as the ink is used for wire marking and is not a graphic arts operation.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Construction Permit Application Form Y.

(a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.

(b) See attached calculations for detailed air toxic calculations. (Appendix A, page 3 of 6)

Conclusion

The construction and operation of this insulated residential and commercial electrical wire manufacturing operation shall be subject to the conditions of the attached proposed **Minor Source Operating Permit MSOP 033-11074-00059.**

Appendix A: Emission Calculations

Company Name: International Wire, Inc.
Address City IN Zip: 1720 US 6, Corunna, IN 46730
CP: 033-11074
Plt ID: 033-00059
Reviewer: PR/EVP
Date: June 21, 1999

Uncontrolled Potential Emissions (tons/year)

	Emissions Generating Activity			
Pollutant	Natural Gas Combustion	Surface Coating	Welding Operations	**TOTAL**
PM	0.07	0.00	0.25	0.32
PM10	0.07	0.00	0.25	0.32
SO2	0.01	0.00	0.00	0.01
NOx	0.99	0.00	0.00	0.99
VOC	0.05	50.03	0.00	50.08
CO	0.83	0.00	0.00	0.83
total HAPs	0.00	16.72	0.02	16.74
worst case single HAP	0.00	(Toluene) 7.65	(Magnesium) 0.02	(Toluene) 7.65

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions (tons/year)

	Emissions Generating Activity			
Pollutant	Natural Gas Combustion	Surface Coating	Welding Operations	**TOTAL**
PM	0.07	0.00	0.25	0.32
PM10	0.07	0.00	0.25	0.32
SO2	0.01	0.00	0.00	0.01
NOx	0.99	0.00	0.00	0.99
VOC	0.05	50.03	0.00	50.08
CO	0.83	0.00	0.00	0.83
total HAPs	0.00	16.72	0.02	16.74
worst case single HAP	0.00	(Toluene) 7.65	(Magnesium) 0.02	(Toluene) 7.65

Total emissions based on rated capacity at 8,760 hours/year, after control.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: International Wire, Inc.
Address City IN Zip: 1720 US 6, Corunna, IN 46730
CP: 033-11074
Plt ID: 033-00059
Reviewer: PR/EVP
Date: June 21, 1999

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Wire Draw																
MD20	7.7	41.00%	40.0%	1.0%	36.8%	0.00%	0.0002770	1600.000	0.12	0.08	0.03	0.82	0.15	0.00	0.08	100%
24MW	7.8	55.00%	50.0%	5.0%	47.0%	0.00%	0.0002770	1600.000	0.74	0.39	0.17	4.17	0.76	0.00	0.39	100%
PVC P1																
PVC	11.4	0.04%	0.0%	0.0%	0.0%	99.96%	0.0025960	76920.000	0.00	0.00	0.84	20.18	3.68	0.00	0.00	100%
Ink	7.7	74.50%	0.0%	74.5%	0.0%	20.20%	0.0000003	76920.000	5.74	5.74	0.11	2.65	0.48	0.00	28.40	100%
Extender	7.1	100.00%	0.0%	100.0%	0.0%	0.00%	0.0000001	76920.000	7.10	7.10	0.05	1.31	0.24	0.00	7.10	100%
Silicone or Wire Coating																
Silicone 3	10.7	4.48%	2.8%	1.7%	3.0%	96.00%	0.0008700	5700.000	0.19	0.18	0.90	21.50	3.92	0.00	0.19	100%
Silicone 1,2,4	10.9	2.95%	2.3%	0.6%	2.5%	97.00%	0.0004540	31636.000	0.07	0.07	0.97	23.36	4.26	0.00	0.07	100%
Ink	7.7	74.50%	0.0%	74.5%	0.0%	20.20%	0.0000001	30982.000	5.74	5.74	0.02	0.55	0.10	0.00	28.40	100%
Extender	7.1	100.00%	0.0%	100.0%	0.0%	0.00%	0.0000097	30982.000	7.10	7.10	2.13	51.05	9.32	0.00	7.10	100%
Silicone or Wire Finishing																
Urethane RV 118	6.9	82.15%	0.0%	82.2%	0.0%	17.30%	0.0000327	24459.000	5.64	5.64	4.51	108.18	19.74	0.00	32.58	100%
Lacquer RL 180	7.6	52.00%	38.7%	13.3%	44.9%	26.58%	0.0000667	24459.000	1.84	1.01	1.65	39.69	7.24	0.00	3.81	100%
PVC P2																
PVC	11.4	0.04%	0.0%	0.0%	0.0%	99.96%	0.0041450	326.000	0.00	0.00	0.01	0.14	0.02	0.00	0.00	100%
Ink	7.7	74.50%	0.0%	74.5%	0.0%	20.20%	0.0000001	326.000	5.74	5.74	0.00	0.01	0.00	0.00	28.40	100%
Extender	7.1	100.00%	0.0%	100.0%	0.0%	0.00%	0.0000097	326.000	7.10	7.10	0.02	0.54	0.10	0.00	7.10	100%
State Potential Emissions			**Add worst case coating to all solvents**								**11.42**	**274.13**	**50.03**	**0.00**		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: **International Wire, Inc.**
Address City IN Zip: **1720 US 6, Corunna, IN 46730**
CP: **033-11074**
Plt ID: **033-00059**
Reviewer: **PR/EVP**
Date: **June 21, 1999**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Dimethyformamide	Weight % MEK	Weight % Antimony	Weight % Glycol Ethers	Weight % Lead	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Dimethyformamide Emissions (ton/yr)	MEK Emissions (ton/yr)	Antimony Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Lead Emissions (ton/yr)
Wire Draw																	
MD20	7.7	0.0002770	1600.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
24MW	7.8	0.0002770	1600.000	0.00%	0.00%	0.00%	0.00%	0.00%	5.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.76	0.00
PVC P1																	
PVC*	11.4	0.0025960	76920.000	0.00%	0.00%	0.00%	0.00%	0.04%	0.00%	0.00%	0.00	0.00	0.00	0.00	3.68	0.00	**0.00**
Ink	7.7	0.0000003	76920.000	6.00%	62.50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.04	0.41	0.00	0.00	0.00	0.00	0.00
Extender	7.1	0.0000001	76920.000	0.00%	75.00%	0.00%	25.00%	0.00%	0.00%	0.00%	0.00	0.18	0.00	0.06	0.00	0.00	0.00
Silicone or Wire Coating																	
Silicone 3	10.7	0.0008700	5700.000	0.00%	0.00%	0.93%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	2.16	0.00	0.00	0.00	0.00
Silicone 1,2,4	10.9	0.0004540	31636.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Ink	7.7	0.0000001	30982.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Extender	7.1	0.0000097	30982.000	0.00%	75.00%	0.00%	25.00%	0.00%	0.00%	0.00%	0.00	6.99	0.00	2.33	0.00	0.00	0.00
Silicone or Wire Finishing																	
Urethane RV 118	7.3	0.0000327	24459.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Lacquer RL 180	7.6	0.0000667	24459.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PVC P2																	
PVC*	11.4	0.0041450	326.000	0.00%	0.00%	0.00%	0.00%	0.04%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.02	0.00	0.00
Ink	7.7	0.0000001	326.000	6.00%	62.50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Extender	7.1	0.0000097	326.000	0.00%	75.00%	0.00%	25.00%	0.00%	0.00%	0.00%	0.00	0.07	0.00	0.02	0.00	0.00	0.00
Total State Potential Emissions											**0.04**	**7.65**	**2.16**	**2.41**	**3.71**	**0.76**	**0.00**
																	16.72

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

* From the MSDS for PVC Compound: Lead compounds are included in this product as a minor ingredient. They function as heat stabilizers or pigments.
Lead and its compounds are known toxic substances; however, when used in PVC compounds they are immobile and will not migrate to the surface of the pellets or manufactured article.
Therefore, the lead ingredients are encapsulated and cannot rub off onto the skin by handling. The only source of entry into the body would be by ingestion of the pellets or finished article--an unlikely event.

Appendix A: Emission Calculations
Natural Gas Combustion
MM Btu/hr 0.3 - < 100

Company Name: **International Wire, Inc.**
Address City IN Zip: **1720 US 6, Corunna, IN 46730**
CP: **033-11074**
Plt ID: **033-00059**
Reviewer: **PR/EVP**
Date: **June 21, 1999**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
2.3	19.7

Heat Input Capacity includes:
fifteen (15) enclosed space heating units, each rated at 0.15 mmBtu per hour, identified as H1-H14 (2.25 mmBtu total)

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0	5.5	84.0
Potential Emission in tons/yr	0.07	0.07	0.01	0.99	0.05	0.83

Methodology:
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 50, Flue gas recirculation = 32
All PM is assumed to be less than 1.0 micrometer in diameter. Therefore, the PM emission factors may be used to estimate PM10, PM2.5, and PM1 er
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1 and 1.4-2, SCC #1-01-006-02, #1-02-006-02, #1-03-006-02, #1-03-006-03
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Welding and Thermal Cutting

Company Name: **International Wire, Inc.**
Address City IN Zip: **1720 US 6, Corunna, IN 46730**
CP: **033-11074**
Plt ID: **033-00059**
Reviewer: **PR/EVP**
Date: **June 21, 1999**

PROCESS	Number of Stations	Max. electrode consumption per station		EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)				TOTAL HAPS (lb/hr)
WELDING		(lbs/hr)		PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Stick (E70S electrode)	2	0.625		0.037	0.003			0.046	0.00375	0.000	0	0.004
Oxyacetylene(carbon steel)	2	0.900		0.0055	0.0005			0.010	0.0009	0.000	0	0.001
EMISSION TOTALS								PM = PM10	Mn	Ni	Cr	Total HAPs
Potential Emissions lbs/hr								0.06	0.00	0.00	0.00	0.00
Potential Emissions lbs/day								1.35	0.11	0.00	0.00	0.11
Potential Emissions tons/year								**0.25**	0.02	0.00	0.00	0.02

METHODOLGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column. Consult AP-42 or other reference for different electrode types.
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.
Welding and other flame cutting emission factors are from an internal training session document.
See AP-42, Chapter 12.19 for additional emission factors for welding.

Appendix A: Emissions Calculations
Volume Weighted Average
From Miscellaneous Fugitive Adhesive Applications Operations

Company Name: International Wire, Inc.
Address City IN Zip: 1720 US 6, Corunna, IN 46730
CP: 033-11074
Plt ID: 033-00059
Reviewer: PR/EVP
Date: June 21, 1999

Compliance Calculations

	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Coating Usage (gal/hr)		VOC lb/gal of coating		lb VOC/hr
Wire Draw				x		=	
MD20	0.0002770	1600.000	0.4432		0.08		0.0340
24MW	0.0002770	1600.000	0.4432		0.39		0.1737
PVC P1							
PVC	0.0025960	76920.000	199.6843	x	0.00	=	0.8411
Ink	0.0000003	76920.000	0.0192		28.40		0.5461
Extender	0.0000001	76920.000	0.0077		7.10		0.0546
Silicone or Wire Coating							
Silicone 3	0.0008700	5700.000	4.9590		0.19		0.9332
Silicone 1,2,4	0.0004540	31636.000	14.3627		0.07		1.0034
Ink	0.0000001	30982.000	0.0040		28.40		0.1135
Extender	0.0000097	30982.000	0.2996		7.10		2.1271
Silicone or Wire Finishing							
Urethane RV 118	0.0000327	24459.000	0.7998		32.58		26.0539
Lacquer RL 180	0.0000667	24459.000	1.6314		3.81		6.2215
PVC P2							
PVC	0.0041450	326.000	1.3513		0.00		0.0057
Ink	0.0000001	326.000	0.0000		28.40		0.0012
Extender	0.0000097	326.000	0.0032		7.10		0.0224
Total			**224.0087**				**38.1315**

Volume-Weighted Average **38.1315/224.0087 = 0.17 VOC lb/gal**

Volume-Weighted Average = (individual coating usage (gal/hr)* Ec) / (coating usage (gal/hr))
where: Ec = pounds of VOC per gallon of coating less water for each coating